



**GENTRY LOCKE**  
Attorneys

Tax ID # 54-0540718

Phone 540-983-9300  
Post Office Box 40013  
Roanoke, VA 24022-0013

November 2, 2023

William E. Callahan, Subchapter V Trustee  
P.O. Box 40013  
Roanoke, VA 24022  
Attn: William Callahan

**RE: Tommy and Anne Dobson**

Client: 29004  
Case: 14  
Invoice: 320527 //199

***For Professional Services Rendered***

<u>Date</u>	<u>Professional Services</u>	<u>Hours</u>	<u>Amount</u>
02/15/23	WECJ: Attend Initial Debtor Interview.	1.20	540.00
02/21/23	WECJ: Review order extending deadline and email to D. Cox regarding endorsement.	0.10	45.00
02/24/23	WECJ: Review email from D. Cox regarding answers to UST questions.	0.10	45.00
03/06/23	WECJ: Review and respond to email from creditor regarding request for schedules.	0.40	180.00
03/06/23	WECJ: Attend 341 meeting (1.7); telephone conference with D. Cox regarding issues (0.1).	1.80	810.00
03/14/23	WECJ: Telephone conference with C. Booker regarding status of case.	0.60	270.00
03/16/23	WECJ: Telephone conference with R. Stevens regarding status of case.	0.50	225.00
03/22/23	WECJ: Review monthly operating report.	0.10	45.00
03/23/23	WECJ: Telephone conference with D. Cox regarding issues in case.	0.60	270.00
03/27/23	WECJ: Review UST subpoena.	0.20	90.00
03/30/23	WECJ: Review UST pleadings regarding eligibility and status of case(0.5); review and respond to email from T. Rollo regarding notices and deadlines (0.1).	0.60	270.00
04/05/23	WECJ: Research claim vs. debt in Section 1182 analysis (0.6); review and respond to emails with D. Cox regarding case issues (0.2).	0.80	360.00
04/06/23	WECJ: Review case regarding status hearing (0.3); appearance at status conference (0.5); telephone conference with D. Cox regarding	1.60	720.00

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<u>Date</u>	<u>Professional Services</u>	<u>Hours</u>	<u>Amount</u>
	plan ideas (0.8).		
04/24/23	WECJ: Review Memorandum of Law by UST (0.3); legal research regarding case law (0.3); email to D. Cox regarding same (0.1).	0.70	315.00
04/25/23	WECJ: Legal research regarding timing of eligibility analysis (1.5); telephone conference with D. Cox regarding case issues (0.2); email to D. Cox regarding same (0.1)	1.80	810.00
04/27/23	WECJ: Emails to D. Cox regarding definition of affiliate.	0.30	135.00
05/01/23	WECJ: Review case and case law (1.2); prepare outline for oral argument regarding UST objection to eligibility (0.6).	1.80	810.00
05/02/23	WECJ: Revise outline of argument regarding UST objection to Sub V election (0.6); appear at hearing regarding same (1.9).	2.50	1,125.00
05/05/23	WECJ: Review complaint regarding nondischargeable debt.	0.30	135.00
05/09/23	WECJ: Review and respond to emails with C. Eason regarding order granting relief.	0.30	135.00
05/10/23	WECJ: Review revised order regarding relief from stay (0.1); review and respond to email from C. Eason regarding same (0.1).	0.20	90.00
05/25/23	WECJ: Review monthly operating report.	0.10	45.00
06/05/23	WECJ: Review proposed Subchapter V Plan.	0.30	135.00
06/09/23	WECJ: Initial review of UST objection to confirmation.	0.30	135.00
06/21/23	WECJ: Review and analyze proposed plan and U.S. Trustee objection to confirmation (0.5); email to D. Cox regarding same (0.1); telephone conference with D. Cox regarding new amended plan (0.4).	1.00	450.00
06/26/23	WECJ: Review amended plan.	0.40	180.00
06/28/23	WECJ: Review comments by U.S. Trustee regarding amended plan.	0.20	90.00
06/30/23	WECJ: Telephone conference with D. Cox regarding potential for sale of house.	0.10	45.00
07/05/23	WECJ: Review and respond to email from D. Cox regarding amended plan.	0.10	45.00
07/07/23	WECJ: Review objection to plan by T. Lynn.	0.20	90.00
07/10/23	WECJ: Telephone conference with D. Cox regarding case issues (0.2); review draft of amended plan (0.6); email to D. Cox regarding comments (0.2).	1.00	450.00
07/19/23	WECJ: Telephone conference with M. Garber regarding case issues and UST actions.	0.50	225.00
07/21/23	WECJ: Review and respond to emails from D. Cox et al regarding	0.30	135.00

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<u>Date</u>	<u>Professional Services</u>	<u>Hours</u>	<u>Amount</u>
	continued hearings.		
07/25/23	WECJ: Review monthly operating report.	0.20	90.00
07/31/23	WECJ: Review docket regarding hearing on plan (0.1); email to D. Cox regarding same (0.1).	0.20	90.00
08/02/23	WECJ: Review case status regarding monthly UST report (0.1); email to assistant regarding same (0.1).	0.20	90.00
08/10/23	WECJ: Review objection to confirmation by T. Lynn (0.2); review order regarding continued hearing on confirmation (0.1).	0.30	135.00
08/11/23	WECJ: Review UST objection to plan (0.2); telephone conference with D. Cox regarding plan alternatives (0.5).	0.70	315.00
08/28/23	WECJ: Telephone conference with D. Cox regarding possible sale of residence in plan (0.6); email to D. Cox regarding plan term (0.2).	0.80	360.00
08/30/23	WECJ: Telephone conference with D. Cox regarding amendment to Plain (0.6); telephone call to N. Walters regarding amended Plan (0.2); telephone conference with N. Littlefield regarding same (0.3); telephone conference with M. Whitely regarding same (0.4); email to D. Cox regarding conversations (0.2); telephone conference with D. Cox regarding same (0.3).	2.00	900.00
08/31/23	WECJ: Telephone conference with M. Marquez regarding amended Plan and client position (0.3); email to D. Cox regarding same (0.1).	0.40	180.00
09/07/23	WECJ: Telephone conference with D. Cox regarding possible changes to Plan.	0.20	90.00
09/11/23	WECJ: Telephone conference with D. Cox regarding new amended plan.	0.30	135.00
09/16/23	WECJ: Prepare for hearing on motion to convert and application to employ accountant.	1.90	855.00
09/18/23	WECJ: Review Plan and schedules regarding best interests issue (0.9); travel to and from Charlottesville (4.2 x .75 = 3.2); appear at hearing on UST motion to convert (6.7);	10.80	4,860.00
10/02/23	WECJ: Review Court Opinion regarding UST motion to convert.	0.50	225.00
10/03/23	WECJ: Review debtors' objections to claims.	0.30	135.00
10/04/23	WECJ: Telephone conference with D. Cox regarding various issues in case.	0.80	360.00
10/11/23	WECJ: Initial review of objections to confirmation of second amended plan.	0.20	90.00
10/16/23	WECJ: Review T. Lynn and UST objections to confirmation (0.4);	1.30	585.00

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<u>Date</u>	<u>Professional Services</u>	<u>Hours</u>	<u>Amount</u>
	legal research regarding confirmation issues (0.6); telephone conference with D. Cox regarding confirmation issues and Lynn Adversary Proceeding (0.3).		
10/17/23	WECJ: Review and respond to emails regarding plan confirmation hearing date.	0.10	45.00
10/19/23	WECJ: Review creditor response to objection to claim.	0.10	45.00
10/20/23	WECJ: Review revised order regarding sale of real estate (0.1); review and respond to email regarding same (0.1).	0.20	90.00
10/20/23	WECJ: Email to D. Cox regarding response to objections to plan.	0.10	45.00
10/23/23	WECJ: Review response to objection to claim (0.2); begin drafting statement regarding confirmation (0.3); telephone conference with D. Cox regarding confirmation (0.3).	0.80	360.00
10/25/23	WECJ: Telephone conference with D. Cox regarding feasibility issue resolution and continuance of confirmation hearing.	0.20	90.00
<b>Current Hours and Fees</b>		<b>43.60</b>	<b>\$19,620.00</b>

<u>Attorney/Paralegal</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
William E. Callahan Jr. (Partner)	43.60	450.00	19,620.00
<b>Current Fees</b>			<b>\$19,620.00</b>

***For Costs Advanced***

<u>Date</u>	<u>Costs Advanced</u>	<u>Units</u>	<u>Rate</u>	<u>Amount</u>
09/18/23	Mileage-Travel Expense - FM/249769,09/25/23 - WILLIAM E. CALLAHAN, JR. - (240 miles @ .655 per mile)			157.20
09/18/23	Misc. Travel Expense - FM/249769,09/25/23 - WILLIAM E. CALLAHAN, JR. - Parking			13.00
09/18/23	Lodging & Meals - Travel Exp. - FM/249769,09/25/23 - WILLIAM E. CALLAHAN, JR. - Meal			8.55

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**Current Costs**

**\$178.75**

**TOTAL Invoice Due**

**\$19,798.75**

**Balance Due Upon Receipt**

For questions concerning your account balance, please contact our billing department at (540) 983-9380 or by email at [billing@gentrylocke.com](mailto:billing@gentrylocke.com).